



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

December 5, 2008

Ms. Denise Decker  
U.S. General Services Administration – PBS  
1800 F Street, NW, Room 3342  
Washington, DC 20405

Re: Department of Homeland Security Headquarters Consolidation at the St. Elizabeths  
(CEQ# 20080452)

Dear Ms. Decker:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement prepared by the General Services Administration for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths in Southeast Washington D.C. In the Final Environmental Impact Statement (FEIS), a new alternative (Alternative 5) has been included for analysis on a programmatic level and selected as the Preferred Alternative. EPA continues to have environmental concerns on the project, and though impacts have been reduced from the Draft Environmental Impact Statement, impacts of the Preferred Alternative have not been fully assessed.

The General Services Administration (GSA) has eliminated Alternatives 1 and 2 from further study in response to comments on the Draft Environmental Impact Statement (DEIS), as these alternatives had the greatest impact to contributing resources of the St. Elizabeths National Historic Landmark (NHL). Alternative 4 has been revised to further reduce harm to the NHL. Alternative 5, the new alternative, introduces use of an additional site, the East Campus, to house a component of the Department of Homeland Security Headquarters (DHS) in combination with lower density use of the West Campus.

The FEIS includes analysis of impacts associated with Alternative 3, revised Alternative 4, and Alternative 5 on the West Campus. As stated in the FEIS (page 3-4), "The affected environment and environmental impacts associated with development on the East Campus are described at a programmatic level." Because the East Campus is discussed at a programmatic level within the FEIS, EPA found the environmental information within the FEIS insufficient to

fully assess the environmental impacts on the East Campus. The FEIS also states, "If Alternative 5 is selected for development of the West Campus, GSA would complete additional, detailed NEPA analysis on the proposed development on the East Campus." It is of concern that resources and impacts on the East Campus have not been detailed with the decision to select the area for development for DHS as the Preferred Alternative. EPA requests the opportunity to review the NEPA analysis to assess resources present, environmental impacts and effort made to minimize impact to resources on the East Campus.

### Alternatives

In summary, Alternative 3 would provide redevelopment of St. Elizabeths West Campus to allow construction of new buildings to provide 4.5 million gross square feet (gsf) of office space, resulting in the demolition of 25 contributing structures. Parking would be provided at a ratio of 1 parking space for every 3 employees plus 640 visitor spaces for a total of approximately 5,300 vehicles on site.

Alternative 4, as modified in the FEIS, would require the demolition of 13 contributing structures (reduced from demolition of 18 contributing buildings proposed in the DEIS), of which eight are the existing greenhouses which are extremely deteriorated and have low reuse potential. Redevelopment would provide 4.5 million gsf of office space on the St. Elizabeths West Campus. Parking would be provided at a ratio of 1 parking space for every 4 employees for 12,863 employees and at a ratio of 1 parking space for every 3 employees for 1,137 24/7 shift work employees, plus 640 visitor spaces for a total of approximately 4,234 vehicles on site.

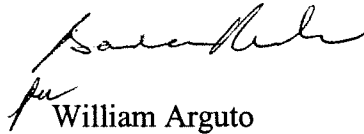
Alternative 5, the Preferred Alternative, consists of approximately 3.8 million gsf of office and shared use space, plus 1.2 million gsf of parking, which would be constructed on the St. Elizabeths West Campus and approximately 750,000 gsf of office space plus parking would be constructed on the St. Elizabeths East Campus to fulfill the 4.5 million gsf requirement for the DHS Headquarters consolidation. Ten contributing buildings on the West Campus would be demolished, eight of which are the existing deteriorated greenhouses. Parking would be provided at a ratio of 1 parking space for every 4 employees for 9,763 employees and at a ratio of 1 parking space for every 3 employees for 1,137 24/7 shift work employees, plus 640 visitor spaces for a total of approximately 3,459 vehicles on site. Impacts to resources by the office and parking space requirement on the East Campus are not specified in the document.

EPA commends DHS for proposing two alternatives that reduce the impact to contributing structures. However, to reiterate EPA's comment in the DEIS, the density proposed (both the 4.5 million gsf and 3.8 million gsf) on the West Campus would significantly impact the integrity of the NHL site. As indicated on page 2-1-7, "An area of the East Campus has been identified to study further as a possible location for a portion of DHS' requirement." Since the area of East Campus is under study, GSA should evaluate if additional DHS components can be located on the East Campus to reduce the build capacity on the West Campus (if Alternative 5 is selected). More detailed comments on the FEIS are presented as an attachment to this letter.



Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



William Arguto  
NEPA Team Leader  
Office of Environmental Programs

Attachment



## *Attachment*

### **GSA Responses to EPA Comments on the DEIS**

GSA's response to EPA's comment on Transportation, comment 141, states that "Figures 3-7, 3-9, 3-11 and 3-13 have been added to the Final EIS to illustrate all proposed transportation improvements and their relationship to the proposed development of the St. Elizabeths West Campus." Figures 3-7 and 3-9 do not illustrate proposed transportation improvements and their relationship to the proposed development of the St. Elizabeths West Campus and Figures 3-11 and 3-13 are not included in the FEIS.

GSA's response to EPA's comment regarding the location of the former West Lodge, comment 320, is not depicted on Figure 1-3. Figure 1-3 in the FEIS is a map which depicts St. Elizabeths in Relation to U.S. Capitol and the White House.

EPA's comment regarding Environmental Justice expressed the need to give consideration to vibration impacts to the surrounding community. GSA's response to this comment is addressed in comment 389. GSA states that "Information on potential impacts from vibrations has been added to Section 5.D.2 of the Final EIS." However, the information pertaining to vibration impact was not found within Section 5.D.2.

### **Miscellaneous**

The FEIS states that the National Capital Planning Commission requested a 2.5 million gsf alternative. GSA developed a study for a 2.862 million gsf alternative plus parking. As indicated on page 3-12, "Figure 3-1 depicts this development option." However, Figure 3-1 depicts the Existing Conditions on the West Campus.

As noted on page 3-18, "There are three Action Alternatives (labeled Alternatives 1 through 4 on Figures 3-3, 3-5, 3-7, and 3-9) under which the St. Elizabeths West Campus would be redeveloped for the DHS Headquarters." This sentence and the Figures should be altered so that the Figures coincide with the Action Alternatives. There are three alternatives (Alternatives 3, 4, and 5) plus the No Action Alternative. Figure 3-3 depicts the Site Study 1 Plan (but does not identify an alternative).

Page 3-19 states, "Security fencing, shown with dotted lines on Figures 3-3 through 3-10, marks the border of the secure campus." There is no Figure 3-10 in the FEIS.

Page 3-28 states, "...and 10 contributing buildings would be demolished. Of the 11 buildings to be demolished, eight are the existing greenhouses which are in extremely deteriorated condition and have low reuse potential." Is the total contributing buildings to be demolished 10 or 11 (for Alternative 5)? This discrepancy should be clarified.